

UNITED STATES DISTRICT COURT
DISTRICT OF UTAH
CENTRAL DIVISION

FILED US District Court-UT
JAN 21 2025 PM02:04

LELAND WILLIAM CALDER
925 E Gregson Ave, Salt Lake City, UT 84106
385-487-0164
Plaintiff,

v.

ANDY ZWEBER, President
GENERAL DISTRIBUTING COMPANY
(Representing Budweiser/Anheuser Busch/ABInBev)
5350 Amelia Earhart Dr, Salt Lake City, UT 84116
Phone: 801-531-7895 / 801-363-4924,

BLAINE BERNARD, Attorney
HOLLAND & HART
222 S Main St Suite 2200, Salt Lake City, UT 84101
Phone: 801-799-5800,

SCOTT VAN WAGONER, Sergeant
South Salt Lake Police Department
2835 S Main St, Salt Lake City, UT 84115
Phone: 801-412-3600,

MIKE BROWN, Chief
Salt Lake City Police Department
475 South 300 East, Salt Lake City, UT 84111
Phone: 801-799-3000,

ERIN MENDENHALL, Mayor
JILL LOVE, Chief Administration Officer
SALT LAKE CITY MAYOR'S OFFICE
451 South State Street, Salt Lake City, UT 84111
Phone: 801-535-7704,

JEANNE ROBISON, Judge
SYDNEY MAGID, Judge
CLEMENS LANDAU, Judge
SALT LAKE CITY JUSTICE COURTS
333 S 200 E, Salt Lake City, UT 84111
Phone: 801-535-6300,

CARMA NIELSON, District Attorney
CHAD J. CARTER, District Attorney
PAIGE WILLIAMSON, District Attorney
MADISON BARR, District Attorney
SCOTT FISHER, District Attorney
SIM GILL, District Attorney
MARK A. FLORES, District Attorney
ALAN WOODLAND, District Attorney
OFFICE OF THE SALT LAKE CITY PROSECUTORS
35 East 500 South, 4th Floor, Salt Lake City, UT 84111
Phone: 385-468-7900,

SEAN REYES, Attorney General
TRINA A. HIGGINS, USAO
DEREK BROWN, Attorney General
OFFICE OF THE ATTORNEY GENERAL, UTAH STATE CAPITOL COMPLEX
350 North State Street Suite 230, Salt Lake City, UT 84114-2320

Case: 2:25-cv-00046
Assigned To : Romero, Cecilia M.
Assign. Date : 1/21/2025
Description: Calder v. Zweber et al

MISS POTTER, Public Defender
JORDAN CONRAD, Public Defender
HANNAH SAKALLA, Public Defender
LANCE BASTIAN, Public Defender
SALT LAKE LEGAL DEFENDER ASSOCIATION
275 E 200 S, Salt Lake City, UT 84111
Phone: 801-532-5444,

SPENCER J. COX, Governor
THE OFFICE OF GOVERNOR
350 N. State Street, Suite 200, P.O. Box 142220, Salt Lake City, UT 84114-2220
Phone: 801-538-1000,

LANCE FRALEY, Claims Adjuster
ANDREW SEELY, Claims Adjuster
DIVISION OF RISK MANAGEMENT
4315 S. 2700 W., Taylorsville, Utah 84129
Phone: 801-957-7170,

Defendants.

COMPLAINT FOR VIOLATION OF CIVIL AND CONSTITUTIONAL RIGHTS

JURISDICTION

1. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1331, as this action arises under the Constitution and laws of the United States. Additionally, jurisdiction is proper under 28 U.S.C. § 1343(a)(3) and (4), which confer jurisdiction over civil actions to redress the deprivation, under color of state law, of rights secured by the Constitution or laws of the United States.

FACTUAL ALLEGATIONS

I. Incident at Budweiser Distribution Center

On September 6, 2022, at the Budweiser Distribution Center located at 5350 Amelia Earhart Dr, Salt Lake City, UT 84116, the plaintiff, Leland William Calder, was assaulted by three individuals, including a manager on duty. This assault led to immediate physical injuries and has caused long-term health complications.

II. Attempted Kidnapping by Elliot Von Otten

Elliot Von Otten attempted to kidnap Leland Calder under the pretense of conducting business, with the intent to take him to California. During this incident, Otten allegedly used ketamine to poison Calder. This event is directly linked to the charges of electronic communication harassment filed against Calder, which the plaintiff contends was a form of "lawfare" used to distract from the main issues of the assault at the distribution center and subsequent police corruption and cover-up by Sergeant Scott Van Wagoner.

III. Lack of Police Report

On September 7, 2022, the plaintiff reported the assault to the police department but has not been provided with a police report. On September 8, 2022, at 2:08 PM, Sergeant Scott Van Wagoner left a voicemail regarding the incident, but no further action was taken to provide the plaintiff with a report or incident documentation.

IV. Pattern of Abuse by Sergeant Scott Van Wagoner

For the past 13 years, Sergeant Scott Van Wagoner has systematically denied the plaintiff his civil and constitutional rights. This ongoing abuse has escalated into broader community violations, demonstrating a pattern of misconduct, particularly in his role as a Vice cop.

V. Communication with Budweiser and Anheuser Busch

From September 7 to 10, 2022, the plaintiff attempted to communicate with Budweiser and Anheuser Busch via email and Instagram about the incident. A phone conversation was recorded where the plaintiff detailed the event, after which there was no further contact from the company.

****VI. False Charges****

On September 11, 2022, the plaintiff was charged with electronic communication harassment, unrelated to the assault and perceived as an attempt to distract from resolving the assault issue. The city and state subjected Mr. Calder to 9 court proceedings with 3 judges and 6 district attorneys, none of whom addressed his civil and constitutional rights regarding these matters. This one-sided indictment exemplified how the judicial system failed to provide justice, appearing instead as a witch hunt on Mr. Calder's character.

****VII. Defamation of Character****

Throughout this process, Mr. Calder's character was defamed through the dissemination of false allegations, further damaging his reputation and standing in the community.

****VIII. Legal Implications and Rights Violations****

The plaintiff invokes several legal principles and rights violations, including:

- ****42 U.S.C. § 1983**** for violations under color of state law.
- ****Selective Prosecution****, ****Vindictive Prosecution****, ****Bias****, ****Prejudice****.
- ****Stare Decisis**** (breaking binding precedent).
- ****Conspiracy Against Rights**** under 18 U.S.C. § 241.
- ****Misconduct by Law Enforcement**** under 18 U.S.C. § 242.
- Violations of First, Fifth, Sixth, Eighth, and Fourteenth Amendments.

****IX. Cease and Desist Order****

On December 2, 2022, the plaintiff received a cease and desist letter from Holland & Hart, representing Budweiser, warning against further discussion of the incident.

****X. Attempts at Resolution****

The plaintiff attempted to resolve the issue through various governmental and corporate channels, including contacting Governor Spencer J. Cox on 13 separate occasions to speak about the failure to intervene in the whole chain of command. Despite these efforts, Governor Cox refused to come to the table and disagree better with these federal violations that have been outlined in this lawsuit, being brought forward into the courts.

****XI. Allegations Against Governor Cox and Lieutenant Governor Henderson Regarding Election Violations****

The plaintiff alleges that Governor Spencer J. Cox and Lieutenant Governor Deidre Henderson have engaged in actions that violate federal election laws, thereby undermining the integrity of state elections:

- ****Concealment, Removal, or Mutilation Generally**** under 18 U.S.C. § 2071, concerning potential manipulation or concealment of election records.
- ****Voting Assistance for the Elderly and Handicapped**** under 52 U.S.C. § 20511, alleging non-compliance with federal mandates for accessible voting.
- ****Obstruction of Proceedings before Departments, Agencies, and Committees**** under 18 U.S.C. § 1505, where obstruction in election audits might have occurred.
- ****Conspiracy to Commit Offense or to Defraud United States**** under 18 U.S.C. § 371, suggesting a coordinated effort to influence election outcomes.
- ****Principals**** under 18 U.S.C. § 2, implicating direct involvement in these alleged illegal activities.

****XII. Notice of Claim****

The plaintiff filed a Notice of Intent to sue on July 10, 2024, within the statutory period for both civil claims against the state (Utah Code Ann. § 63G-7-401 et seq.) and the company.

****DAMAGES****

- ****Immediate Physical Injury:**** A basketball-sized bruise on the plaintiff's right thigh, upper leg, and hip region.
- ****Long-term Health Effects:**** Chronic pain, muscle spasms, hip issues, and general health deterioration.
- ****Economic Damages:**** Medical expenses, lost wages, and future loss of earning capacity.

- **Punitive Damages:** For the reckless disregard of the plaintiff's rights and safety.
- **Emotional Distress, Pain & Suffering:** Psychological impact including trauma, anxiety, depression, and loss of enjoyment of life.
- **Future Economic Damages:** Anticipated costs for continued medical treatment, therapy, and potential surgeries.

****RELIEF SOUGHT****

The plaintiff seeks:

- ****1 Billion Dollars**** from the State of Utah.
- ****5 Billion Dollars**** from ABInBev/Budweiser/Anheuser Busch.
- ****1 Billion Dollars**** from General Distributing Company.
- ****1 Billion Dollars**** from Holland & Hart law firm.

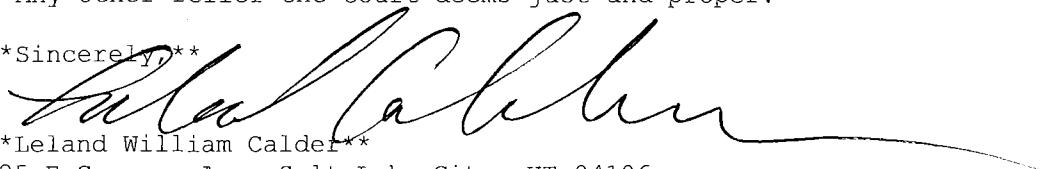
For violations of his First Amendment rights, systemic oppression, social classism, public corruption, and the physical and psychological injuries sustained.

****PRAYER FOR RELIEF****

Plaintiff prays for:

- Compensatory damages for all losses, both immediate and future.
- Punitive damages for egregious conduct.
- An injunction preventing further harassment or retaliation.
- Any other relief the Court deems just and proper.

****Sincerely,****



****Leland William Calder****

925 E Gregson Ave, Salt Lake City, UT 84106
385-487-0164

Lelandcalder1984@gmail.com